

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)
)
v.)
)
CHARLES E. SANDERS)
)
)
	<u>INFORMATION</u>

The United States Attorney charges:

COUNT ONE

On or about the 29th day of November 2006, at the Army Air Force Exchange Service (AAFES), at Maxwell Air Force Base, in the Middle District of Alabama, CHARLES E. SANDERS, JR. negotiated and delivered a negotiable instrument for a thing of value and with the intent, knowledge, and expectation that it would not be honored by the drawee. Said negotiable instrument being of the following tenor and description: Check number 1016, dated November 29, 2006, made payable to the Army and Air Force Exchange Services in the amount of \$200.00, drawn on the account of CHARLES E. SANDERS, at Alabama Credit Union, in violation of Section 13A-9-13.1, Code of Alabama, and Title 18, Section 13, United States Code.

COUNT TWO

On or about the 21st day of December 2006, at the Army Air Force Exchange Service (AAFES), at Maxwell Air Force Base, in the Middle District of Alabama, CHARLES E. SANDERS, JR. negotiated and delivered a negotiable instrument for a thing of value and with the intent, knowledge, and expectation that it would not be honored by the drawee. Said negotiable instrument being of the following tenor and description: Check number 1023, dated December 21, 2006, made payable to the Army and Air Force Exchange Services in the amount of \$125.00, drawn on the account of CHARLES E. SANDERS, at Alabama Credit Union, in violation of Section 13A-9-13.1, Code of Alabama, and Title 18, Section 13, United States Code.

COUNT THREE

On or about the 29th day of December 2006, at the Army Air Force Exchange Service (AAFES), at Maxwell Air Force Base, in the Middle District of Alabama, CHARLES E. SANDERS

negotiated and delivered a negotiable instrument for a thing of value and with the intent, knowledge, and expectation that it would not be honored by the drawee. Said negotiable instrument being of the following tenor and description: Check number 1025, dated December 29, 2006, made payable to the Army and Air Force Exchange Services in the amount of \$250.00, drawn on the account of CHARLES E. SANDERS, at Alabama Credit Union, in violation of Section 13A-9-13.1, Code of Alabama, and Title 18, Section 13, United States Code.

COUNT FOUR

On or about the 2nd day of January 2007, at the Army Air Force Exchange Service (AAFES), at Maxwell Air Force Base, in the Middle District of Alabama, CHARLES E. SANDERS negotiated and delivered a negotiable instrument for a thing of value and with the intent, knowledge, and expectation that it would not be honored by the drawee. Said negotiable instrument being of the following tenor and description: Check number 1028, dated January 2, 2007, made payable to the Army and Air Force Exchange Services in the amount of \$300.00, drawn on the account of CHARLES E. SANDERS at Alabama Credit Union, in violation of Section 13A-9-13.1, Code of Alabama, and Title 18, Section 13, United States Code.

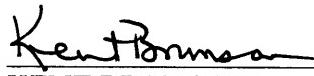
COUNT FIVE

On or about the 6th day of January 2007, at the Army Air Force Exchange Service (AAFES), at Maxwell Air Force Base, in the Middle District of Alabama, CHARLES E. SANDERS negotiated and delivered a negotiable instrument for a thing of value and with the intent, knowledge, and expectation that it would not be honored by the drawee. Said negotiable instrument being of the following tenor and description: Check number 1027, dated January 6, 2007, made payable to the Army and Air Force Exchange Services in the amount of \$150.00, drawn on the account of CHARLES E. SANDERS at Alabama Credit Union, in violation of Section 13A-9-13.1, Code of Alabama, and Title 18, Section 13, United States Code.

COUNT SIX

On or about the 16th day of January 2007, at the Army Air Force Exchange Service (AAFES), at Maxwell Air Force Base, in the Middle District of Alabama, CHARLES E. SANDERS negotiated and delivered a negotiable instrument for a thing of value and with the intent, knowledge, and expectation that it would not be honored by the drawee. Said negotiable instrument being of the following tenor and description: Check number 1031, dated January 16, 2007, made payable to the Army and Air Force Exchange Services in the amount of \$300.00, drawn on the account of CHARLES E. SANDERS at Alabama Credit Union, in violation of Section 13A-9-13.1, Code of Alabama, and Title 18, Section 13, United States Code.

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STATE OF ALABAMA
COUNTY OF MONTGOMERY

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AFFIDAVIT

The undersigned, being first duly sworn, deposes and says:

I, ROBERT G. SMITH, was formerly employed by the Army Air Force Exchange Service (AAFES) at Maxwell Air Force Base as a store detective. I am currently assigned at Barksdale Air Force Base, Louisiana. On 6 March 2007, I notified the Air Force Office of Special Investigations that CHARLES E. SANDERS had written six insufficient funds checks at the AAFES Base Exchange located on Maxwell AFB, Alabama. The following checks were returned for insufficient funds:

1. Check No. 1016, made payable to the Army Air Force Exchange Services, dated 29 November 2006, in the amount of \$200.00, signed by CHARLES E. SANDERS.
2. Check No. 1023, made payable to the Army Air Force Exchange Services, dated 21 December 2006, in the amount of \$125.00, signed by CHARLES E. SANDERS.
3. Check No. 1025, made payable to the Army Air Force Exchange Services, dated 29 December 2006, in the amount of \$250.00, signed by CHARLES E. SANDERS.
4. Check No. 1028, made payable to the Army Air Force Exchange Services, dated 2 January 2007, in the amount of \$300.00, signed by CHARLES E. SANDERS.
5. Check No. 1027, made payable to the Army Air Force Exchange Services, dated 6 January 2007, in the amount of \$150.00, signed by CHARLES E. SANDERS.
6. Check No. 1031, made payable to the Army Air Force Exchange Services, dated 16 January 2007, in the amount of \$300.00, signed by CHARLES E. SANDERS.

The total amount of the checks, including the insufficient funds check fees, written by CHARLES E. SANDERS from 29 November 2006 through 16 January 2007 was \$1475.00.

Robert G. Smith
ROBERT G. SMITH

Subscribed and sworn to before me this 17th day of September, 2007.

